

# PAUL GROMER, LLC

ATTORNEY AT LAW

151 MERRIMAC STREET, SUITE 660  
BOSTON, MASSACHUSETTS 02114-4714

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(617) 227-7024

June 21, 2005

Mary L. Cottrell  
Secretary of the Department  
Department of Telecommunications and Energy  
One South Station – 2<sup>nd</sup> Floor  
Boston, MA 02110

**Re: Service Quality Standards; D.T.E. 04-116; Technical Sessions**

Dear Ms. Cottrell:

I write on behalf of the International Brotherhood of Electrical Workers, Local 103 ("IBEW Local 103") to request that the Department expand the agenda for the technical sessions in the above-captioned proceeding to include discussion of the ***training and procurement of outside electrical contractors***. This issue could be considered as a stand alone topic, or grouped with the topic of inspection and maintenance guidelines.

IBEW Local 103 discussed the importance of training and procurement of outside electrical contractors in its initial and reply comments in this proceeding. The issue is simple. A skilled, trained workforce is essential to the safety of the distribution system. Unfortunately, however, there are currently no standards being applied for the training of electrical contractors working on the electric underground distribution system in Massachusetts. For electricians outside the utility industry, the state Board of Examiners of Electricians (the "Board") imposes rigorous training standards as part of licensure requirements. However, Massachusetts utilities take the position that they are free to use unlicensed electrical contractors.<sup>1</sup> As a result, the Board's training requirements are being evaded and there is currently no alternative training requirement in place.

It would be difficult for the Department to develop its own training standard. However, it need not do so. Both state and federal agencies certify apprenticeship training programs for electricians. IBEW Local 103 recommends that the Department simply piggyback on that existing certification process and require that the utilities use contractors that have completed state and federally certified training programs. Massachusetts Electric has voluntarily adopted such a requirement for its outside electrical contractors; IBEW Local 103 recommends

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<sup>1</sup> See, e.g., Letter of Kerry Britland to Ronald F. LeComte re Maintenance and Inspection Practices of Underground Facilities, p. 2 (January 21, 2005).

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that the Department extend this requirement to all electric distribution companies.<sup>2</sup>

The issue of the training of electrical contractors is integrally related to the issue of inspection and maintenance, a topic the Department has indicated will likely be included among the topics for the technical sessions. As the distribution companies explained in their responses to the Department's inquiry regarding manhole explosions, a critical piece of current inspection efforts is that work crews conduct an inspection every time they enter a manhole. Obviously enough, however, the quality of an inspection is only as good as the quality of the inspector. An inspection conducted by untrained workers is little better than no inspection at all.

Accordingly, IBEW Local 103 requests that the Department expand the agenda for the technical sessions to include discussion of the training and procurement of outside electrical contractors, either as a stand alone topic or grouped with the topic of inspection and maintenance guidelines.

Thank you for your consideration.

Sincerely yours,

Paul W. Gromer

Encl.

Cc: Andrew Kaplan, General Counsel  
Jody Stiefel, Hearing Officer  
Service List (via e-mail)  
dte.efiling@state.ma.us

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<sup>2</sup> Letter of Amy Rabinowitz to Mary Cottrell re Maintenance and Inspection Practices of Underground Facilities, p. 2 (January 21, 2005).